Our date 09.12.10 Our reference STUK response 0349 Administrative officer Shelley Rouse



Statoil (UK) Ltd

Bob Fletcher Modification Panel Secretary Joint Office of Gas Transporters Ground Floor red, 31 Homer Road, Solihull West Midlands B91 3QJ

Dear Bob,

Modification Proposal 0349: Introduction of a Force Majeure Capacity Management Arrangement

Thank you for the opportunity to comment on the above modification proposal. Statoil (UK) Ltd is in support of implementation of this proposal, and as such would like to make the following comments

Statoil agrees with the proposer that the implementation of this proposal will have the following positive benefits:

- Provide clear rules for the treatment of NTS Entry capacity at an ASEP where National Grid NTS has called FM
- Reduce the impact of FM upon Users by ensuring that a payment is made to Users in respect of costs associated with an instance of FM where a Users registered Firm NTS Entry capacity rights are affected
- Removes risk of Users at new and existing entry points having to pay in full for booked capacity that cannot be fully utilised.
- Remove a potential disincentive that may deter Users from investing in capacity at new and existing entry points due to non recovery by Users of costs of Registered Firm NTS Entry Capacity which cannot be utilised due to FM.

Statoil also agrees with the proposer as to which relevant objectives will be better facilitated should this proposal be implemented.

If you have any questions relating to this response please contact me on the below number.

Kind regards

Shelley Rouse Statoil (UK) Ltd srouse@Statoil.com

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